

William S. Miller the land and premises described above in Paragraph 2, default having occurred in a certain promissory note executed by Henry Fraley and Elizabeth Fraley, his wife, dated the 5th day of October, 1877, and secured by the aforesaid land and premises, said conveyance having taken place in accordance with those certain equity proceedings filed as Equity No. 4487 in the Circuit Court for Frederick County, Maryland; that the said William S. Miller did depart this life between 1900 to 1910, his estate being probated on the 5th day of April, 1910, as SDT1-65, and that the known heirs of the said William S. Miller are Virginia B. Miller, widow, who died the 15th day of May, 1928; George William Miller, Evelyn Ford, Isabella Martin, the heirs of Daniel B. Miller, a deceased son, to wit: Harriet Miller, widow, and Charles Miller, son; the heirs of Dr. Mary Negrea, a deceased daughter, to wit: Louisa Lavinia and James Negrea; all being the heirs of the said William S. Miller; that the land and premises owned in fee simple and of record by the Plaintiffs as described above directly adjoins and abuts the land and premises owned of record by the Defendants as described above; that the Plaintiffs, Howard J. Jennings and Marie L. Jennings, together with their predecessors in title, for more than twenty (20) years last past, have had the actual and constructive peaceable possession of the land and premises described above; that upon information and belief, the Defendants claim of record or otherwise to be the record owners of the land and premises more particularly described above; that the Plaintiffs, Howard J. Jennings and Marie L. Jennings, together with their predecessors in title, have held possession of the land and premises more particularly described in the above, notoriously and hostilely, with a claim of right for more than twenty (20) years; and that the Plaintiffs are entitled to relief under Section 14-108, Real Property Article, Annotated Code of Maryland (1981 Repl. Vol.); that the Plaintiffs do not have an adequate remedy at law; that all